

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

John Hancock Life Insurance Company)	
(U.S.A.))	
)	Civil Action 4:18-cv-02869
)	
The Estate of Jennifer Lauren Wheatley)	
c/o Louis A. Wheatley, et al.)	

UNOPPOSED MOTION TO WITHDRAW AND SUBSTITUTE COUNSEL

Plaintiff, John Hancock Life Insurance Company (U.S.A.) (“*Plaintiff*”) files this Motion to Withdraw and Substitute Counsel, and in support thereof would show the following:

Plaintiff wishes to allow one of its current counsel of record to withdraw, namely: Gregory J. Sachnik.

Plaintiff wishes to substitute the following counsel as lead counsel of record:

Tricia W. Macaluso
BRYAN CAVE LEIGHTON PAISNER LLP
2200 Ross, Suite 3300
Dallas, Texas 75201
Telephone: 214-721-8000
Facsimile: 214-721-8100
Email: tricia.macaluso@bclplaw.com

As grounds for this motion, Plaintiff states that Mr. Sachnik departed the Bryan Cave Leighton Paisner LLP law firm, effective July 17, 2020. Tricia Macaluso, another attorney in the Bryan Cave Leighton Paisner LLP law firm, is prepared to assume the defense of this matter in place of Mr. Sachnik.

Plaintiff further moves that Ms. Macaluso be designated as one of Plaintiff’s counsel of record in this matter. All notices, pleadings, correspondence and documents propounded or

issued by the Court or other parties should be addressed to Ms. Macaluso at the addresses provided below.

WHEREFORE, Plaintiff prays that the Court grant this Motion to Withdraw and Substitute Counsel, and grant all such other relief to which Plaintiff may show as justly entitled.

Respectfully submitted this 21st day of July, 2020.

/s/ Tricia W. Macaluso
Tricia W. Macaluso
Texas Bar No. 24013773
Southern District No. 9757
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Attorneys for Plaintiff

CERTIFICATE OF CONFERENCE

On July 21, 2020, I contact counsel of record for each party, and they indicated that they do not oppose the relief requested in the foregoing Motion to Withdraw and Substitute Counsel.

/s/ Jennifer L. Berhorst
Jennifer L. Berhorst

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon all counsel of record through CM/ECF on July 21, 2020.

By: /s/ Tricia W. Macaluso
Tricia W. Macaluso